

BOIES SCHILLER FLEXNER LLP

David Boies (*pro hac vice*)

333 Main Street

Armonk, NY 10504

(914) 749-8200

dboies@bsfllp.com

Maxwell V. Pritt (SBN 253155)

Joshua M. Stein (SBN 298856)

44 Montgomery Street, 41st Floor

San Francisco, CA 94104

(415) 293-6800

mpritt@bsfllp.com

jstein@bsfllp.com

Jesse Panuccio (*pro hac vice*)

1401 New York Ave, NW

Washington, DC 20005

(202) 237-2727

jpanuccio@bsfllp.com

Joshua I. Schiller (SBN 330653)

David L. Simons (*pro hac vice*)

55 Hudson Yards, 20th Floor

New York, NY 10001

(914) 749-8200

jischiller@bsfllp.com

dsimons@bsfllp.com

*Interim Lead Counsel for Individual and
Representative Plaintiffs and the Proposed Class*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF MAXWELL V. PRITT
IN SUPPORT OF PLAINTIFFS' LETTER
BRIEF**

I, Maxwell V. Pritt, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner, LLP (“BSF”), interim lead counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein and, if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. § 1746 and Local Rule 6-3 in support of Plaintiffs’ Letter Brief.

2. Attached as Exhibit A is a true and correct copy of a letter Plaintiffs sent to Meta on September 18, 2024.

3. Attached as Exhibit B is a true and correct copy of a letter Plaintiffs sent to Meta on October 23, 2024.

4. Attached as Exhibit C is a true and correct copy of a letter Meta sent to Plaintiffs on November 1, 2024.

5. Attached as Exhibit D is a true and correct copy of the transcript of the deposition of Melanie Kambadur, which took place on September 17, 2024.

6. Attached as Exhibit E is a true and correct copy of Meta’s Amended Non-Email Privilege Log.

7. Attached as Exhibit F is a true and correct copy of Meta’s Amended Email Privilege Log.

8. Attached as Exhibit G is a true and correct copy of a document produced by Meta with the first Bates number Meta_Kadrey_00037441.

9. Attached as Exhibit H is a true and correct copy of a document produced by Meta with the first Bates number Meta_Kadrey_00047085.

10. Attached as Exhibit I is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00051427.

11. Attached as Exhibit J is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00054433.

12. Attached as Exhibit K is a true and correct copy of a document produced by Meta

with the first Bates Number Meta_Kadrey_00054435.

13. Attached as Exhibit L is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00054894.

14. Attached as Exhibit M is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00054898.

15. Attached as Exhibit N is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00055255.

16. Attached as Exhibit O is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00064494.

17. Attached as Exhibit P is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00065244.

18. Attached as Exhibit Q is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00074729.

19. Attached as Exhibit R is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00079062

20. Attached as Exhibit S is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00093927.

21. Attached as Exhibit T is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_00094284.

22. Attached as Exhibit U is a true and correct copy of a document produced by Meta with the first Bates Number Meta_Kadrey_000101508.

23. Attached as Exhibit V is a true and correct copy of an email chain between Plaintiffs' counsel and Meta's counsel from October 8 to October 11, 2024.

24. Attached as Exhibit W is a true and correct copy of Meta's Second Amended Initial Disclosures, dated October 21, 2024.

//

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 8th day of November 2024 in San Francisco, California.

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt